January 18, 2005

Washington State Department of Agriculture
Endangered Species Program
1111 Washington St., 2nd Floor - NRB
PO Box 42589
Olympia, WA 98504-2589

To Whom It May Concern:

I am writing in response to your Draft document entitled, Washington State Endangered Species Protection Plan for Pesticide Use. Overall the draft covers a clear plan to provide EPA with information to ensure product registrations that have considered threatened and endangered species in Washington, which should result in maintaining a wide array of pesticides in the IPM toolbox and that those products, when used according to the product label and county endangered species bulletins, will be protective of sensitive species.

However, I did not find any discussion within the plan on how the plan is to be funded and supported and how long the plan would take to complete its objectives. I think financial accountability is crucial to any public dollars spent.

Also, I found no information within the Phase 3: County Bulletin Development portion that described the method of distribution or financial support for the county bulletin distribution. WSU Extension is an obvious established, recognized network, along with dealers, through which bulletins can be distributed, and equally important to provide education on bulletin comprehension and compliance. I would like to take this opportunity to remind WSDA that EPA cut the funding to the Pesticide Safety Education Programs (PSEP) by 30% a few years ago and that WSU's sole federal support for certification of restricted use applicators is less than $16,000 annually and there is no targeted support dollars from the state for PSEP. I would strongly suggest that WSDA incorporate an education component into their plan and provide adequate support for the initial development and delivery of education materials and sustained support education delivery.

If you have any questions or require clarifications, please contact me.

Sincerely yours,

Carol Ramsay
Pesticide Education Specialist